Form C-144 Revised April 3, 2017

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Department
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.

For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

| Proposed Alternative Method Permit or Closure Plan Application   | INS DIV DIET &   |
|--|--|
| Type of action: Below grade tank registration  | B 1 3 2018   |
| Permit of a pit or proposed alternative method   | Without State Stat |
| Closure of a pit, below-grade tank, or proposed alternative method   | Tank C.  |
| Modification to an existing permit/or registration  Closure plan only submitted for an existing normitted at the least the lea | vy arada tank  |
| Closure plan only submitted for an existing permitted or non-permitted pit, belo or proposed alternative method  | w-grade tank,  |
| Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative   | reauest  |
| Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water,   |  |
| environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules   |  |
| Operator: BP America Production Company  OGRID #: 778  |  |
| Operator: BP America Production Company OGRID #: 778  200 Energy Court, Farmington, NM 87401   |  |
| Facility or well name: WARREN A LS 001A  |  |
| API Number: 3004525232 OCD Permit Number:  |  |
| API Number: 3004525232 OCD Permit Number: U/L or Qtr/Qtr C Section 25 Township 28N Range 09W County: San Juan  |  |
| Center of Proposed Design: Latitude 36.63798 Longitude -107.74312 NA   | VD83   |
| Surface Owner: Federal State Private Tribal Trust or Indian Allotment  | 1003   |
|  |  |
| Pit: Subsection F, G or J of 19.15.17.11 NMAC  |  |
|  |  |
| Temporary: Drilling Workover   |  |
| Permanent Emergency Cavitation P&A Multi-Well Fluid Management Low Chloride Drilling Fluid   |  |
| Lined Unlined Liner type: Thicknessmil LLDPE HDPE PVC Other  |  |
| ☐ String-Reinforced  |  |
| Liner Seams: Welded Factory Other Volume: bbl Dimensions: Lx   | W x D  |
| 3.   |  |
| Below-grade tank: Subsection I of 19.15.17.11 NMAC   |  |
| Volume: 95 bbl Type of fluid: Produced Water   |  |
| Tank Construction material: Steel  |  |
| Secondary containment with leak detection  Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off   |  |
| ☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other Single wall/ Double bottom; sidewalls not visible   |  |
| Liner type: Thickness mil  HDPE PVC Other  |  |
|  |  |
| Alternative Method:  |  |
| Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for cons   | ideration of approval  |
|  | approvar.  |
| Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)   |  |
|  | naha al Inamital   |
| Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, so institution or church)  | school, nospital,  |
| Four foot height, four strands of barbed wire evenly spaced between one and four feet  | 7  |
| ☐ Alternate. Please specify  |  |

| Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)  Screen Netting Other  Monthly inspections (If netting or screening is not physically feasible)   |               |
|--|---------------|
| Signs: Subsection C of 19.15.17.11 NMAC  12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers  Signed in compliance with 19.15.16.8 NMAC  |               |
| Variances and Exceptions:  Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.  Please check a box if one or more of the following is requested, if not leave blank:  Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.  Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. |               |
| 9. Siting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptance are provided below. Siting criteria does not apply to drying pads or above-grade tanks.   | ptable source |
| General siting   |               |
| Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.  - □ NM Office of the State Engineer - iWATERS database search; □ USGS; □ Data obtained from nearby wells  | Yes No        |
| Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.  NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | Yes No        |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. ( <b>Does not apply to below grade tanks</b> )  - Written confirmation or verification from the municipality; Written approval obtained from the municipality   | Yes No        |
| Within the area overlying a subsurface mine. (Does not apply to below grade tanks)  - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division  | ☐ Yes ☐ No    |
| <ul> <li>Within an unstable area. (Does not apply to below grade tanks)</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>  | ☐ Yes ☐ No    |
| Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map   | ☐ Yes ☐ No    |
| Below Grade Tanks  |               |
| Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site   | ☐ Yes ☐ No    |
| Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;.  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site   | ☐ Yes ☐ No    |
| Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)   |               |
| Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)  - Topographic map; Visual inspection (certification) of the proposed site  | Yes No        |
| Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.  Visual inspection (contification) of the proposed sites Aprilal photos Satallite image.  | ☐ Yes ☐ No    |
| - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  Within 200 horizontal fact of a graing on a private democratic faceh protection and had been face been face because and a grant of the democratic faceh protection.   |               |
| Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.  NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site  | Yes No        |

| Within 100 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site  |               |  |  |  |  |  |  |  |
|--|---------------|--|--|--|--|--|--|--|
| Temporary Pit Non-low chloride drilling fluid  |               |  |  |  |  |  |  |  |
| Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site   | ☐ Yes ☐ No    |  |  |  |  |  |  |  |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image   | ☐ Yes ☐ No    |  |  |  |  |  |  |  |
| Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site  |               |  |  |  |  |  |  |  |
| Within 300 feet of a wetland US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site  | ☐ Yes ☐ No    |  |  |  |  |  |  |  |
| Permanent Pit or Multi-Well Fluid Management Pit   |               |  |  |  |  |  |  |  |
| Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site  | ☐ Yes ☐ No    |  |  |  |  |  |  |  |
| Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.   |               |  |  |  |  |  |  |  |
| - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  | ☐ Yes ☐ No    |  |  |  |  |  |  |  |
| Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.  |               |  |  |  |  |  |  |  |
| - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site  | ☐ Yes ☐ No    |  |  |  |  |  |  |  |
| Within 500 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site  |               |  |  |  |  |  |  |  |
|  | 2440          |  |  |  |  |  |  |  |
| Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 No Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the document of the subsection of the subsecti |               |  |  |  |  |  |  |  |
| attached.  Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC  |               |  |  |  |  |  |  |  |
| Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  | NMAC          |  |  |  |  |  |  |  |
| ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC   |               |  |  |  |  |  |  |  |
| Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.   | 15.17.9 NMAC  |  |  |  |  |  |  |  |
| and 19.15.17.13 NMAC  Previously Approved Design (attach copy of design) API Number: or Permit Number:   |               |  |  |  |  |  |  |  |
|  |               |  |  |  |  |  |  |  |
| Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the docattached.   | cuments are   |  |  |  |  |  |  |  |
| <ul> <li>□ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>□ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC</li> <li>□ A List of wells with approved application for permit to drill associated with the pit.</li> <li>□ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19</li> </ul>   | .15.17.9 NMAC |  |  |  |  |  |  |  |
| and 19.15.17.13 NMAC  ☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC  ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  |               |  |  |  |  |  |  |  |
| Previously Approved Design (attach copy of design) API Number: or Permit Number:   |               |  |  |  |  |  |  |  |
|  |               |  |  |  |  |  |  |  |

|  | <u></u>  |                     |  |  |  |  |  |  |  |  |
|--|--|---------------------|--|--|--|--|--|--|--|--|
|  | Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the  | documents are       |  |  |  |  |  |  |  |  |
|  | attached.  Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Climatological Factors Assessment  |                     |  |  |  |  |  |  |  |  |
|  | ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC   |                     |  |  |  |  |  |  |  |  |
| ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Quality Control/Quality Assurance Construction and Installation Plan |  |                     |  |  |  |  |  |  |  |  |
|  | ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC   |                     |  |  |  |  |  |  |  |  |
|  | <ul> <li>Nuisance or Hazardous Odors, including H₂S, Prevention Plan</li> <li>Emergency Response Plan</li> <li>Oil Field Waste Stream Characterization</li> </ul>  |                     |  |  |  |  |  |  |  |  |
|  | Monitoring and Inspection Plan  Erosion Control Plan   |                     |  |  |  |  |  |  |  |  |
|  | Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC   |                     |  |  |  |  |  |  |  |  |
|  | Proposed Closure: 19.15.17.13 NMAC Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.   |                     |  |  |  |  |  |  |  |  |
|  | Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well F   | luid Management Pit |  |  |  |  |  |  |  |  |
|  | Proposed Closure Method: Waste Excavation and Removal Waste Removal (Closed-loop systems only)   |                     |  |  |  |  |  |  |  |  |
|  | ☐ On-site Closure Method (Only for temporary pits and closed-loop systems) ☐ In-place Burial ☐ On-site Trench Burial ☐ Alternative Closure Method  |                     |  |  |  |  |  |  |  |  |
|  | 14. Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be  | attached to the     |  |  |  |  |  |  |  |  |
| 1  | closure plan. Please indicate, by a check mark in the box, that the documents are attached.  Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  |                     |  |  |  |  |  |  |  |  |
| 1  | ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)  |                     |  |  |  |  |  |  |  |  |
|  | <ul> <li>☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC</li> <li>☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC</li> <li>☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC</li> </ul> |                     |  |  |  |  |  |  |  |  |
| ]  | 15.  |                     |  |  |  |  |  |  |  |  |
|  | Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC  Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour  | rce material are    |  |  |  |  |  |  |  |  |
|  | provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. In 19.15.17.10 NMAC for guidance.   | Please refer to     |  |  |  |  |  |  |  |  |
|  | Ground water is less than 25 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | ☐ Yes ☐ No<br>☐ NA  |  |  |  |  |  |  |  |  |
|  | Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | Yes No              |  |  |  |  |  |  |  |  |
|  | Ground water is more than 100 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | Yes No              |  |  |  |  |  |  |  |  |
|  | Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site   | Yes No              |  |  |  |  |  |  |  |  |
|  | Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image   | ☐ Yes ☐ No          |  |  |  |  |  |  |  |  |
|  | Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application.  - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site  | ☐ Yes ☐ No          |  |  |  |  |  |  |  |  |
|  | Written confirmation or verification from the municipality; Written approval obtained from the municipality  | ☐ Yes ☐ No          |  |  |  |  |  |  |  |  |
|  | Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site   | ☐ Yes ☐ No          |  |  |  |  |  |  |  |  |
|  | Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance  |                     |  |  |  |  |  |  |  |  |

| adopted pursuant to NMSA 1978, Section 3-27-3, as amended.  - Written confirmation or verification from the municipality; Written approval obtained from the municipality  | ☐ Yes ☐ No               |  |  |  |  |
|--|--------------------------|--|--|--|--|
| Within the area overlying a subsurface mine.  - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division  | ☐ Yes ☐ No               |  |  |  |  |
| <ul> <li>Within an unstable area.</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>  |                          |  |  |  |  |
| Within a 100-year floodplain FEMA map  | ☐ Yes ☐ No               |  |  |  |  |
| On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plants are compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC  Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.  Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.  Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC  Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC  Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cann Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  | 11 NMAC<br>15.17.11 NMAC |  |  |  |  |
| Operator Application Certification:  I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and beling the complete to the complete to the best of my knowledge and beling the complete to the best of my knowledge and beling the complete to the complete to t |                          |  |  |  |  |
| e-mail address:  |                          |  |  |  |  |
| OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature:  Approval Date: 2  | 6/2018                   |  |  |  |  |
| Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC  Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed.  |                          |  |  |  |  |
| Closure Completion Date: 12/20/2017  |                          |  |  |  |  |
|  | op systems only)         |  |  |  |  |

| Operator Closure Certification:                 |  |
|---|--|
|   | th this closure report is true, accurate and complete to the best of my knowledge and losure requirements and conditions specified in the approved closure plan. |
| Name (Print): Erin Garifalos                    | Title: Field Environmental Coordinator   |
| Signature:e-mail address: erin.garifalos@bp.com | Date: February 9, 2018  Telephone: (832) 609-7048  |

# BP AMERICA PRODUCTION COMPANY SAN JUAN BASIN, NORTHWEST NEW MEXICO

## BELOW-GRADE TANK CLOSURE PLAN

## WARREN A LS 001A

API No. 3004525232

Unit Letter C Section 25 T 28N R 09W

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BP shall close a BGT within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the New Mexico Oil Conservation Division (NMOCD) requires because of imminent danger to fresh water, public health, safety or the environment. If deviations from this plan are necessary, any specific changes will be included on form C-144 and approved by the NMOCD. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofit with a BGT that complies with the BP NMOCD approved BGT design attached to the BP Design and Construction Plan. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, if not previously retrofitted to comply with the BP NMOCD approve BGT Design attached to the BP Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BP shall close the permitted BGT within 60 days of cessation of the BGTs operation or as required by the transitional provisions of Subsection B, D, or E of 19.15.17.17 NMAC.

### General Closure Plan

1. BP shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.

#### Notice is attached.

2. BP shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.

#### Notice was provided and is attached.

- 3. BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:
  - a. BP Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
  - b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
  - c. Basin Disposal, Permit NM-01-0005 (Liquids)
  - d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
  - e. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)

- f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
- g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
- h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
- i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
- j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
- k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

# All liquids and sludge in the BGT were removed and sent to one of the above NMOCD approved facilities for disposal.

4. BP shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the NMOCD approves. If a liner is present and must be disposed of it will be cleaned by scraping any soils or other attached materials on the liner to a de minimus amount and disposed at a permitted solid waste facility, pursuant to Subparagraph (m) of Paragraph (1) of Subsection C of 19.15.35.8 NMAC. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.

## The BGT was transported for recycling.

5. BP shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.

### All equipment associated with the BGT has been removed.

6. BP shall test the soils beneath the BGT to determine whether a release has occurred. BP shall collect at a minimum: a five (5) point composite sample and individual grab samples from any area that is wet, discolored or showing other evidence of a release and analyze for BTEX, TPH and chlorides. The testing methods for those constituents are as follows;

| Constituents | Testing Method                              | Release Verification | Sample  |
|--------------|---|----------------------|---------|
|              | 95 bbl BGT                                  | (mg/Kg)              | results |
| Benzene      | US EPA Method SW-846 8021B or 8260B         | 10                   | < 0.019 |
| Total BTEX   | US EPA Method SW-846 8021B or 8260B         | 50                   | < 0.075 |
| TPH          | US EPA Method SW-846 418.1 or 8015 extended | 100                  | <46     |
| Chlorides    | US EPA Method 300.0 or 4500B                | 620                  | <30     |

Notes: mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons. Other EPA methods that the division approves may be applied to all constituents listed. Chloride closure standards will be determined by which ever concentration level is greatest.

Soil under the BGT was sampled for chloride, TPH and BTEX with all concentrations below the stated limits. The field report and laboratory reports are attached.

7. BP shall notify the division District III office of its results on form C-141. **C-141 is attached.** 

8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.

Sampling results indicate a release has not occurred. Attached is a laboratory report and C-141.

9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not with in the active process area

Sampling results indicate a release has not occurred. Attached is a laboratory report and field report. The location will be reclaimed when the well is plugged and abandoned.

10. BP shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. BP shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Subsection H of 19.15.17.13 NMAC, re-contour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Subsection I of 19.15.17.13 NMAC.

The area has been backfilled and a 105 bbl shallow low profile above-ground tank set atop BGT location. The location will be reclaimed once the well is plugged and abandoned.

11. The soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.

The area has been backfilled and a 105 bbl shallow low profile above-ground tank set atop BGT location. The location will be reclaimed once the well is plugged and abandoned.

12. BP shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be accomplished by drilling on the contour whenever practical or by other division-approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.

The area has been backfilled and a 105 bbl shallow low profile above-ground tank set atop BGT location. The location will be reclaimed once the well is plugged and abandoned.

13. BP shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.

The area has been backfilled and a 105 bbl shallow low profile above-ground tank set atop BGT location. The location will be reclaimed once the well is plugged and abandoned.

14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BP shall notify the NMOCD when it has seeded or planted and when it successfully achieves revegetation.

The area has been backfilled and a 105 bbl shallow low profile above-ground tank set atop BGT location. The location will be reclaimed once the well is plugged and abandoned.

- 15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
  - a. proof of closure notification (surface owner and NMOCD)
  - b. sampling analytical reports; information required by 19.15.17 NMAC;
  - c. disposal facility name and permit number
  - d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
  - e. site reclamation, photo documentation.

Closure report on C-144 form is included including photos of reclamation completion.

16. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

Certification section of C-144 has been completed.

District I 1625 N. French Dr., Hobbs, NM 88240 District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410 <u>District IV</u> 1220 S. St. Francis Dr., Santa Fe, NM 87505

### State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised April 3, 2017 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

| OPERATOR       ☐ Initial Report       ■ Final Report         Name of Company BP America Production Company       Contact Erin Garifalos         Address 200 Energy Court, Farmington, NM 87401       Telephone No. (832) 609-7048  |  |  |  |  |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|--|--|--|--|
| Name of Company BP America Production Company Contact Erin Garifalos   |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |
| Facility Name WARREN A LS 001A Facility Type: Natural Gas Well   |  |  |  |  |  |  |  |  |  |  |  |
| Surface Owner: Federal Mineral Owner: Federal API No. 3004525232   |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |
| LOCATION OF RELEASE  |  |  |  |  |  |  |  |  |  |  |  |
| Unit Letter Section Township Range Feet from the North/South Line Feet from the East/West Line County  |  |  |  |  |  |  |  |  |  |  |  |
| C 25 28N 09W 790 North 1,710 West San Juan   |  |  |  |  |  |  |  |  |  |  |  |
| Latitude 36.63798 Longitude -107.74312 NAD83   |  |  |  |  |  |  |  |  |  |  |  |
| NATURE OF RELEASE  |  |  |  |  |  |  |  |  |  |  |  |
| Type of Release: ; none Volume of Release: ; unknown Volume Recovered: ; N/A   |  |  |  |  |  |  |  |  |  |  |  |
| Source of Release: below grade tank - 95 bbl  Date and Hour of Occurrence: n/a  Date and Hour of Discovery: n/a  |  |  |  |  |  |  |  |  |  |  |  |
| Was Immediate Notice Given?  |  |  |  |  |  |  |  |  |  |  |  |
| By Whom? Date and Hour   |  |  |  |  |  |  |  |  |  |  |  |
| Was a Watercourse Reached?  If YES, Volume Impacting the Watercourse.  |  |  |  |  |  |  |  |  |  |  |  |
| ☐ Yes ☑ No   |  |  |  |  |  |  |  |  |  |  |  |
| If a Watercourse was Impacted, Describe Fully.*  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |
| Describe Cause of Problem and Remedial Action Taken.*  |  |  |  |  |  |  |  |  |  |  |  |
| Sampling of the soil beneath the BGT was done during removal.  |  |  |  |  |  |  |  |  |  |  |  |
| Soil analysis resulted for Chlorides, BTEX, and TPH below BGT  |  |  |  |  |  |  |  |  |  |  |  |
| closure standards. Field reports and laboratory results are attached.  |  |  |  |  |  |  |  |  |  |  |  |
| Describe Area Affected and Cleanup Action Taken.* No action necessary. Final laboratory analysis determined no   |  |  |  |  |  |  |  |  |  |  |  |
| remedial action is required.   |  |  |  |  |  |  |  |  |  |  |  |
| Temediai action is required.   |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |
| I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger |  |  |  |  |  |  |  |  |  |  |  |
| public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability  |  |  |  |  |  |  |  |  |  |  |  |
| should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health  |  |  |  |  |  |  |  |  |  |  |  |
| or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other  |  |  |  |  |  |  |  |  |  |  |  |
| federal, state, or local laws and/or regulations.  OIL CONSERVATION DIVISION   |  |  |  |  |  |  |  |  |  |  |  |
| OTE CONSERVATION DIVISION  |  |  |  |  |  |  |  |  |  |  |  |
| Signature:  Approved by Environmental Specialist:  |  |  |  |  |  |  |  |  |  |  |  |
| Approved by Environmental Specialist:  |  |  |  |  |  |  |  |  |  |  |  |
| Printed Name: Erin Garifalos   |  |  |  |  |  |  |  |  |  |  |  |
| Title: Field Environmental Coordinator Approval Date: Expiration Date:   |  |  |  |  |  |  |  |  |  |  |  |
| E-mail Address: erin.garifalos@bp.com  Conditions of Approval:  Attached   |  |  |  |  |  |  |  |  |  |  |  |
| Date: February 9, 2018 Phone: (832) 609-7048   |  |  |  |  |  |  |  |  |  |  |  |

<sup>\*</sup> Attach Additional Sheets If Necessary

# bp



BP America Production Company 200 Energy Court Farmington, NM 87401

December 8, 2017

Bureau of Land Management Whitney Thomas 6251 College Suite A Farmington, NM 87402

#### VIA EMAIL

Re: Notification of plans to close/remove a below grade tank Well Name: WARREN A LS 001A

API#: 3004525232

Dear Mrs. Thomas,

As part of the NM "Pit Rule": 19.15.17.13 Closure Requirements, Paragraph J. BP America Production Company (BP) is required to notify the surface owner of BP's plans to close/remove a below grade tank. BP wishes to inform you of our plans to close/remove the below grade tank on its well pad located on your surface. BP plans to commence this work on or about December 15, 2017. If there aren't any unforeseen problems, the work should be completed within 10 working days.

As a point of clarification, BP will be closing the below grade tank and either operating without one or replacing it with an above ground tank, the well site will continue to operate.

If witnessing of the tank removal is required please contact me for a specific time (832)-609-7048.

Sincerely,

Erin Garifalos

BP America Production Company

From:

Buckley, Farrah (CH2M HILL)

To:

Smith, Cory, EMNRD; Fields, Vanessa, EMNRD (Vanessa, Fields@state.nm.us)

Cc:

jeffcblagg@aol.com; blagg\_njv@yahoo.com; Garifalos, Erin

Subject: Date: BP Pit Close Notification - WARREN A LS 001A Friday, December 08, 2017 11:20:17 AM

#### **BP America Production Company**

200 Energy Court Farmington, NM 87401 Phone: (505) 326-9200

### SENT VIA E-MAIL TO: <u>CORY.SMITH@STATE.NM.US</u>; <u>VANESSA.FIELDS@STATE.NM.US</u>

December 8, 2017

New Mexico Oil Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410

RE: Notice of Proposed Below-Grade Tank (BGT) Closure

WARREN A LS 001A API 30-045-25232 (C) Section 25 – T28N – R09W San Juan County, New Mexico

Dear Mr. Cory Smith and Mrs. Vanessa Fields,

In regards to the captioned subject and requirements of the NMOCD pit rule, this letter is notification that BP is planning to close a 95bbl BGT that will no longer be operational at this well site. We anticipate this work to start on or around December 15, 2017.

Should you have any questions, please feel free to contact BP at our Farmington office.

Sincerely,

Erin Garifalos

Field Environmental Coordinator – San Juan Cell: 832-609-7048

# Farrah Buckley

**BGT Project Support** 970-946-9199 -cell

This email and any attachments are intended only for the addressee(s) listed above and may contain confidential, proprietary, and/or privileged information. If you are not an intended recipient, please immediately advise the sender by return email, delete this email and any attachments, and destroy any copies of same. Any unauthorized review, use, copying disclosure or distribution of this email and any attachments is prohibited.

| BP  |                                 | NGINEERING, INC                     |               | API#: 3004525232             |                       |  |  |  |  |  |
|---|---------------------------------|-------------------------------------|---------------|------------------------------|-----------------------|--|--|--|--|--|
| CLIENT:   |                                 | LOOMFIELD, NM                       | 87413         | TANK ID                      | A                     |  |  |  |  |  |
|   | (50                             | 05) 632-1199                        |               | (if applicble):              | Α                     |  |  |  |  |  |
| FIELD REPORT:   | (circle one): BGT CONFIRMATION  | / RELEASE INVESTIGATION / OTH       | ER:           | PAGE#: <b>1</b> _            | _ of <b>1</b> _       |  |  |  |  |  |
| SITE INFORMATION  | I: SITE NAME: WARRE             | EN A LS #1A                         |               | DATE STARTED:                | 12/15/17              |  |  |  |  |  |
| QUAD/UNIT: C SEC: 25 TWP:   | 28N RNG: 9W PM:                 |                                     | ST: NM        | DATE FINISHED:               |                       |  |  |  |  |  |
| 1/4 -1/4/FOOTAGE: <b>790'N / 1,71</b>   |                                 | TYPE: FEDERAL / STATE / FE          |               |                              |                       |  |  |  |  |  |
| 000000  |                                 | STRIKE ONTRACTOR: BP - J. GON       |               | ENVIRONMENTAL SPECIALIST(S): | NJV                   |  |  |  |  |  |
| REFERENCE POINT   | : WELL HEAD (W.H.) GPS          | 36.63820                            | X 107.74316   | GL ELEV.:                    | 6,031'                |  |  |  |  |  |
| 1) 95 BGT (SW/DB)   | GPS COORD.: 36                  | 5.63798 X 107.74312                 | DISTANCE/BEAF |                              |                       |  |  |  |  |  |
| 2)  |                                 |                                     |               |                              |                       |  |  |  |  |  |
| 3)  |                                 |                                     |               |                              |                       |  |  |  |  |  |
| 4)  |                                 |                                     |               | RING FROM W.H.:              |                       |  |  |  |  |  |
|   |                                 |                                     | DISTANCE/BEAR | NING PROW W.H.               | OVM                   |  |  |  |  |  |
| SAMPLING DATA:  | CHAIN OF CUSTODY RECORD(S) # C  |                                     |               | ED/0004D/200 0 (OI)          | READING<br>(ppm)      |  |  |  |  |  |
| 1) SAMPLE ID: 5PC - TB @ 5'   |                                 |                                     |               | 5B/8021B/300.0 (CI)          | NA                    |  |  |  |  |  |
| SAMPLE ID:  |                                 |                                     |               |                              |                       |  |  |  |  |  |
| 4) SAMPLE ID:   |                                 |                                     |               |                              |                       |  |  |  |  |  |
| 5) SAMPLE ID:   | SAMPLE DATE:                    | SAMPLE TIME: LAE                    | B ANALYSIS:   |                              |                       |  |  |  |  |  |
| SOIL DESCRIPTION  | SOIL TYPE: SAND SILTY SAND      |                                     | OTHER         |                              |                       |  |  |  |  |  |
| SOIL COLOR: DARK YEL  |                                 | PLASTICITY (CLAYS): NON PLASTIC / S |               | OUTCOME LATERULA DI ACTIO    | ZI IIOI II V DI ACTIO |  |  |  |  |  |
| COHESION (ALL OTHERS): NON COHESIVE / SLIGHTL   |                                 | DENSITY (COHESIVE CLAYS & SIL       |               |                              |                       |  |  |  |  |  |
| CONSISTENCY (NON COHESIVE SOILS): LC  |                                 | HC ODOR DETECTED: YES NO EX         |               |                              |                       |  |  |  |  |  |
| MOISTURE: DRY/SLIGHTLY MOIST / WOIST / W  |                                 |                                     |               |                              |                       |  |  |  |  |  |
| SAMPLE TYPE: GRAB COMPOSITE - #   |                                 | ANY AREAS DISPLAYING WETNESS:       | YES NO EXPLAN | IATION -                     |                       |  |  |  |  |  |
| DISCOLORATION/STAINING OBSERVED: YES N  |                                 |                                     |               |                              |                       |  |  |  |  |  |
| SITE OBSERVATION  |                                 |                                     |               |                              |                       |  |  |  |  |  |
| APPARENT EVIDENCE OF A RELEASE OBSERVE EQUIPMENT SET OVER RECLAIMED AREA:             | D AND/OR OCCURRED : YES NO EXPL | ANATION:                            | OVE CDADE TAN | IV TO DE CET ATOD D          | OT LOCATION           |  |  |  |  |  |
| OTHER: NMOCD OR BLM REPS. NOT PR  | RESENT TO WITNESS CONFIRMA      | L SHALLOW LOW PROFILE AB            | OVE-GRADE IAN | NK TO BE SET ATOP B          | GI LOCATION.          |  |  |  |  |  |
|   |                                 |                                     |               |                              |                       |  |  |  |  |  |
| EXCAVATION DIMENSION ESTIMATION:  |                                 |                                     |               | IMATION (Cubic Yards)        |                       |  |  |  |  |  |
|   | EAREST WATER SOURCE: >1,000     | NEAREST SURFACE WATER:<             | <1,000' NMOC  | D TPH CLOSURE STD:           | <b>1,000</b> ppm      |  |  |  |  |  |
| SITE SKETCH   | BGT Located: off on site        | e PLOT PLAN circle:                 | attached      | CALIB. READ. = NA            | ppm   RF =1.00        |  |  |  |  |  |
|   | ↑ то                            |                                     | <b>▲</b> lovm | CALIB. GAS = NA              | ppm                   |  |  |  |  |  |
| COMPRESSOR  | W.H.                            |                                     | N TIME:       |                              | NA                    |  |  |  |  |  |
| 7   |                                 |                                     | 11            | MISCELL. N                   | OTEC                  |  |  |  |  |  |
|   | ~                               | B                                   | l             |                              | OIES                  |  |  |  |  |  |
| SEPARATOR   | PROD.<br>TANK                   | METER                               |               | O:                           |                       |  |  |  |  |  |
|   |                                 | RUN                                 |               | EF#: P-816                   | /DA                   |  |  |  |  |  |
|   |                                 |                                     | <u> </u>      |                              | B2                    |  |  |  |  |  |
| FENCE →   | ( )x' ( )                       |                                     |               | J#:                          | 014.414.0             |  |  |  |  |  |
|   |                                 |                                     |               |                              | 6/14/10               |  |  |  |  |  |
|   | PBGTL                           |                                     | OC            |                              | 3/03/17<br>or Meter   |  |  |  |  |  |
|   | T.B. ~ 5'                       |                                     | ID            | ppm = parts per mill         | lion                  |  |  |  |  |  |
|   | B.G. / BERM                     |                                     | Α             |                              | 0                     |  |  |  |  |  |
|   | DEIGH                           | X                                   | - S.P.D.      | BGT Sidewalls Visible:       |                       |  |  |  |  |  |
| NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATIO                                       |                                 |                                     |               | BGT Sidewalls Visible:       |                       |  |  |  |  |  |
| T.B. = TANK BOTTOM; PBGTL = PREVIOUS BELI<br>APPLICABLE OR NOT AVAILABLE: SW - SINGLE | OW-GRADE TANK LOCATION;         |                                     | L; NA - NOT   | agnetic declination:         | 10°E                  |  |  |  |  |  |
| NOTES: GOOGLE EARTH IMAGE   |                                 | ONSITE: 12/15/17                    |               |                              |                       |  |  |  |  |  |

#### **Analytical Report**

Lab Order 1712988

Date Reported: 12/20/2017

## Hall Environmental Analysis Laboratory, Inc.

**CLIENT:** Blagg Engineering Client Sample ID: 5PC-TB@5' (95)

Collection Date: 12/15/2017 1:20:00 PM Project: Warren A LS 1A

Lab ID: 1712988-001 Matrix: MEOH (SOIL) Received Date: 12/16/2017 9:00:00 AM

| Analyses                       | Result      | PQL Qu | al Units | DF | Date Analyzed          | Batch    |
|--------------------------------|-------------|--------|----------|----|------------------------|----------|
| EPA METHOD 300.0: ANIONS       |             |        |          |    | Analyst:               | MRA      |
| Chloride                       | ND          | 30     | mg/Kg    | 20 | 12/18/2017 1:15:35 PM  | 35566    |
| EPA METHOD 8015M/D: DIESEL RAN | GE ORGANICS | ;      |          |    | Analyst                | TOM      |
| Diesel Range Organics (DRO)    | ND          | 9.2    | mg/Kg    | 1  | 12/18/2017 11:29:32 AM | A 35560  |
| Motor Oil Range Organics (MRO) | ND          | 46     | mg/Kg    | 1  | 12/18/2017 11:29:32 AM | A 35560  |
| Surr: DNOP                     | 82.0        | 70-130 | %Rec     | 1  | 12/18/2017 11:29:32 AM | A 35560  |
| EPA METHOD 8015D: GASOLINE RAM | NGE         |        |          |    | Analyst                | NSB      |
| Gasoline Range Organics (GRO)  | ND          | 3.7    | mg/Kg    | 1  | 12/18/2017 11:31:58 AM | 4 G47852 |
| Surr: BFB                      | 83.2        | 15-316 | %Rec     | 1  | 12/18/2017 11:31:58 AM | 4 G47852 |
| EPA METHOD 8021B: VOLATILES    |             |        |          |    | Analyst:               | NSB      |
| Benzene                        | ND          | 0.019  | mg/Kg    | 1  | 12/18/2017 11:31:58 AM | 1 B47852 |
| Toluene                        | ND          | 0.037  | mg/Kg    | 1  | 12/18/2017 11:31:58 AM | 1 B47852 |
| Ethylbenzene                   | ND          | 0.037  | mg/Kg    | 1  | 12/18/2017 11:31:58 AN | 1 B47852 |
| Xylenes, Total                 | ND          | 0.075  | mg/Kg    | 1  | 12/18/2017 11:31:58 AM | 1 B47852 |
| Surr: 4-Bromofluorobenzene     | 104         | 80-120 | %Rec     | 1  | 12/18/2017 11:31:58 AM | B47852   |

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

#### Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- Analyte detected below quantitation limits Page 1 of 5 J
- P Sample pH Not In Range
- RL Reporting Detection Limit
- Sample container temperature is out of limit as specified

| Chain-of-Custody Record                             |                                 | Turn-Around Time: SAME |                   |                                |  | HALL ENVIRONMENTAL       |           |  |                |             |                    |              |               |   |                        |             |                 |                          |       |             |                        |                      |
|---|---------------------------------|------------------------|-------------------|--------------------------------|--|--------------------------|-----------|--|----------------|-------------|--------------------|--------------|---------------|---|------------------------|-------------|-----------------|--------------------------|-------|-------------|------------------------|----------------------|
| Client:   | BLAG                            | G ENGR.                | / BP AMERICA      | ☐ Standard                     | ☑ Rush _   | DAY                      |           | U.S.   |                |             |                    |              |               |   |                        |             |                 |                          |       |             |                        |                      |
|   |                                 |                        |                   | Project Name                   |  |                          |           | ANALYSIS LABORATOI www.hallenvironmental.com |                |             |                    |              |               |   |                        |             |                 |                          |       |             |                        |                      |
| Mailing Ad  | ailing Address: P.O. BOX 87 WAR |                        |                   |                                | ARREN A L  | S # 1A                   |           | 49   | 01 H           | ławk        |                    |              |               |   |                        |             |                 |                          | 9     |             |                        |                      |
|   |                                 | BLOOM                  | FIELD, NM 87413   | Project #:                     |  |                          |           |  |                | 05-3        |                    |              |               |   |                        |             | -410            |                          |       |             |                        |                      |
| Phone #:  |                                 | (505) 63               | 32-1199           | 1                              |  |                          | 18        |  |                |             | i ki               | A            | Anal          | ysis  | Rec                    | ques        | st              |                          |       |             |                        |                      |
| email or F  | email or Fax#:                  |                        | Project Manag     | ger:                           |  |                          |           |  |                |             |                    |              | ÷             |   |                        |             | 1)              |                          |       |             |                        |                      |
| QA/QC Package:  Standard  Level 4 (Full Validation) |                                 |                        | NELSON VI         | ELEZ                           | <del>/B's</del> (8021B)  | (Aluo                    | MRO)      |  | 1)             |             | 15)                |              | PO4,50        | PCB's   |                        |             | ter - 300.1)    |                          |       | a)          |                        |                      |
| Accreditation:                                      |                                 | Sampler:               | <b>NELSON VI</b>  | ELEZ                           | 15<br>88   | TPH (Gas                 | DRO /     | 1.   |                | OSIN        |                    | 102          | 808           |   |                        | / water     |                 |                          | du    |             |                        |                      |
| □ NELAP   | _                               | □ Other                |                   | On lice: 100, 100              | MICHIGANIAN DESCRIPTION AND THE PROPERTY OF TH | El No 201                | 1         |  | -              | 418.1)      | 504                | 8270SIMS)    | S             | 03,1  | se/se                  |             | (AC             | 0.00                     |       |             | te sa                  | N                    |
| □ EDD (T  | ype)                            | T                      |                   |                                | erature Z. 9   |                          | 4         | BE +   | (GR            | pou         | hod                | 0 0          | etal          | CLN   | icid                   | 8           | ni-V            | oil - 3                  |       | ple         | oosi                   | 3 (3                 |
| Date  | Time                            | Matrix                 | Sample Request ID | Container Type and #  Moth kit | Preservative<br>Type   | HEAL No.                 | BTEX +-MF | BTEX + MTBE                                  | TPH 8015B (GRO | TPH (Method | EDB (Method 504.1) | PAH (8310 or | RCRA 8 Metals | Anions (F,CI,NO <sub>3</sub> ,NO <sub>2</sub> ,PO <sub>4</sub> ,SO <sub>4</sub> ) | 8081 Pesticides / 8082 | 8260B (VOA) | 8270 (Semi-VOA) | Chloride (soil - 300.0 / |       | Grab sample | 5 pt. composite sample | Air Bubbles (Y or N) |
| 12/15/17  | 1320                            | SOIL                   | 5PC - TB @ 5 (95) | 4 oz 1                         | Cool   | -001                     | ٧         |  | ٧              |             |                    |              |               |   |                        |             |                 | ٧                        |       |             | ٧                      |                      |
|   |                                 |                        |                   |                                |  |                          |           |  |                |             |                    |              |               |   |                        |             |                 |                          |       |             |                        |                      |
|   |                                 |                        |                   |                                |  |                          |           |  |                |             |                    |              |               |   |                        |             |                 |                          |       |             |                        |                      |
|   | 7.77.110                        |                        |                   |                                |  |                          |           |  |                |             |                    |              |               |   |                        |             |                 |                          |       |             |                        | $\Box$               |
|   |                                 |                        |                   |                                |  |                          |           |  |                |             |                    |              |               |   |                        |             |                 |                          |       |             |                        |                      |
|   | 1.75                            |                        |                   |                                |  |                          |           |  |                |             |                    |              |               |   |                        |             |                 |                          |       |             |                        | $\overline{}$        |
|   |                                 |                        |                   |                                |  |                          |           |  |                |             |                    |              |               |   |                        |             |                 |                          |       |             |                        |                      |
|   |                                 |                        |                   |                                |  |                          |           |  |                |             |                    |              |               |   |                        |             |                 |                          |       |             |                        | $\overline{}$        |
|   |                                 |                        |                   |                                |  |                          |           |  |                |             |                    |              |               |   |                        |             |                 |                          |       |             |                        | $\overline{}$        |
| -   |                                 |                        |                   |                                |  |                          |           |  |                |             |                    |              |               |   |                        |             |                 |                          |       |             |                        |                      |
|   |                                 |                        |                   |                                |  |                          |           |  |                |             |                    |              |               |   |                        |             |                 |                          |       |             |                        |                      |
|   |                                 |                        |                   |                                |  |                          |           |  | _              |             |                    |              |               |   |                        |             |                 |                          |       |             |                        | _                    |
| Date:   | Time:                           | Relinquish             | ed by:            | Received by:                   |  | Date Time                | Rem       | arks   | :              |             |                    |              |               |   |                        |             | ACT V           | VITH (                   | CORRE | SPON        | DING                   | VID                  |
| Date: Time: Relinguished by:                        |                                 |                        | Men Uf            | Received by:                   | Jan  | 2  5   5  <br> Date Time | С         |  |                | & REI       | I GA               | RIFA         | LOS           |   |                        |             | ON              |                          |       |             |                        |                      |
| 1915/1844 Nival                                     |                                 |                        | Id                | < [5]                          | 16/17 09:00  | Ref                      |           | ice#   |                | P-          | 816                |              |               |   |                        |             |                 |                          |       |             |                        |                      |

## Hall Environmental Analysis Laboratory, Inc.

WO#:

1712988

20-Dec-17

Client:

Blagg Engineering

Project:

Warren A LS 1A

Sample ID MB-35566

SampType: mblk

TestCode: EPA Method 300.0: Anions

Client ID:

Batch ID: 35566

RunNo: 47855

Units: mg/Kg

Analyte

Prep Date: 12/18/2017

Analysis Date: 12/18/2017

SeqNo: 1532772

**HighLimit** 

**RPDLimit** %RPD

Qual

Chloride

Client ID:

Result PQL

Sample ID LCS-35566

LCSS

SampType: Ics

TestCode: EPA Method 300.0: Anions

RunNo: 47855

Prep Date: 12/18/2017

Batch ID: 35566

SeqNo: 1532773

Units: mg/Kg

Analysis Date: 12/18/2017

SPK value SPK Ref Val %REC LowLimit

Analyte

PQL

1.5

HighLimit %RPD **RPDLimit** 

Qual

15.00

96.5

14

0

SPK value SPK Ref Val %REC

110

Chloride

#### Qualifiers:

- Value exceeds Maximum Contaminant Level.
- Sample Diluted Due to Matrix D
- Holding times for preparation or analysis exceeded H
- Not Detected at the Reporting Limit ND **PQL** Practical Quanitative Limit
- % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- Analyte detected below quantitation limits
- Sample pH Not In Range
- RL Reporting Detection Limit
- Sample container temperature is out of limit as specified

Value above quantitation range

Page 2 of 5

## Hall Environmental Analysis Laboratory, Inc.

WO#:

1712988

20-Dec-17

Client:

Blagg Engineering

Project:

Warren A LS 1A

| Sample ID LCS-35560         | SampType: LCS TestCode: EPA Method 8015M/D: Diesel Range Organics |  |           |                             |      |          | e Organics |      |                 |      |
|-----------------------------|---|--|-----------|-----------------------------|------|----------|------------|------|-----------------|------|
| Client ID: LCSS             | Batch II  | Batch ID: <b>35560</b> RunNo: <b>47845</b> |           |                             |      |          |            |      |                 |      |
| Prep Date: 12/18/2017       | Analysis Dat  | e: <b>12</b>                               | /18/2017  | SeqNo: 1530855 Units: mg/Kg |      |          |            |      |                 |      |
| Analyte                     | Result  | PQL  | SPK value | SPK Ref Val                 | %REC | LowLimit | HighLimit  | %RPD | <b>RPDLimit</b> | Qual |
| Diesel Range Organics (DRO) | 47  | 10   | 50.00     | 0                           | 93.3 | 73.2     | 114        |      |                 |      |
| Surr: DNOP                  | 4.5   |  | 5.000     |                             | 89.9 | 70       | 130        |      |                 |      |

| Sample ID MB-35560             | SampT      | ype: ME | BLK       | Tes         | tCode: E | PA Method | 8015M/D: Die | esel Range | e Organics |      |
|--------------------------------|------------|---------|-----------|-------------|----------|-----------|--------------|------------|------------|------|
| Client ID: PBS                 | Batch      | ID: 35  | 560       | R           | RunNo: 4 | 7845      |              |            |            |      |
| Prep Date: 12/18/2017          | Analysis D | ate: 12 | 2/18/2017 | S           | SeqNo: 1 | 530856    | Units: mg/K  | (g         |            |      |
| Analyte                        | Result     | PQL     | SPK value | SPK Ref Val | %REC     | LowLimit  | HighLimit    | %RPD       | RPDLimit   | Qual |
| Diesel Range Organics (DRO)    | ND         | 10      |           |             |          |           |              |            |            |      |
| Motor Oil Range Organics (MRO) | ND         | 50      |           |             |          |           |              |            |            |      |
| Surr: DNOP                     | 8.9        |         | 10.00     |             | 89.4     | 70        | 130          |            |            |      |

Qualifiers:

\* Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

PQL Practical Quanitative Limit

S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank

E Value above quantitation range

J Analyte detected below quantitation limits

Page 3 of 5

P Sample pH Not In Range

RL Reporting Detection Limit

W Sample container temperature is out of limit as specified

## Hall Environmental Analysis Laboratory, Inc.

WO#:

1712988

20-Dec-17

Client: Project: Blagg Engineering Warren A LS 1A

Sample ID RB

SampType: MBLK

TestCode: EPA Method 8015D: Gasoline Range

Client ID:

Batch ID: G47852

RunNo: 47852

%REC

Prep Date:

Analysis Date: 12/18/2017 PQL

5.0

5.0

SeqNo: 1531574

Units: mg/Kg

HighLimit

Analyte

%RPD

%RPD

Qual

Gasoline Range Organics (GRO)

Result ND

SPK value SPK Ref Val

86.1

**RPDLimit** 

Surr: BFB

860

1000

316

Sample ID 2.5UG GRO LCS

SampType: LCS

TestCode: EPA Method 8015D: Gasoline Range

Client ID: LCSS

Batch ID: G47852

RunNo: 47852

LowLimit

15

Units: mg/Kg

Analyte Gasoline Range Organics (GRO)

Prep Date:

Analysis Date: 12/18/2017 Result PQL

25

1000

SPK value SPK Ref Val 25.00

1000

1000

SeqNo: 1531575 %REC LowLimit 99.8

HighLimit 75.9 131 **RPDLimit** 

Qual

Surr: BFB

0

316 101 15

Sample ID MB-35539 Client ID:

Sample ID LCS-35539

Prep Date: 12/15/2017

PBS

SampType: MBLK

Batch ID: 35539

RunNo: 47852

15

TestCode: EPA Method 8015D: Gasoline Range

Units: %Rec

SPK value SPK Ref Val %REC

SeqNo: 1531578 LowLimit

HighLimit %RPD 316

**RPDLimit** Qual

Analyte Surr: BFB

Prep Date:

LCSS

12/15/2017

SampType: LCS Batch ID: 35539

Analysis Date: 12/18/2017

POI

Analysis Date: 12/18/2017

TestCode: EPA Method 8015D: Gasoline Range

87.7

RunNo: 47852

SeqNo: 1531579

LowLimit

Units: %Rec

%RPD

**RPDLimit** Qual

Page 4 of 5

Analyte Surr: BFB

Client ID:

Result 970

1000

SPK Ref Val

SPK value

%REC 97.0

15

HighLimit 316

### Qualifiers:

ND

Value exceeds Maximum Contaminant Level.

Not Detected at the Reporting Limit

- Sample Diluted Due to Matrix D
- Holding times for preparation or analysis exceeded H
- **PQL** Practical Quanitative Limit
- % Recovery outside of range due to dilution or matrix
- В Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- Р Sample pH Not In Range
- RL Reporting Detection Limit
- Sample container temperature is out of limit as specified

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1712988

20-Dec-17

Client: Project:

Blagg Engineering Warren A LS 1A

| Sample ID RB               | SampT      | SampType: MBLK                                      |           |                                 | tCode: El |          |           |      |          |      |
|----------------------------|------------|---|-----------|---------------------------------|-----------|----------|-----------|------|----------|------|
| Client ID: PBS             | Batch      | 1D: <b>B4</b>                                       | 7852      | F                               |           |          |           |      |          |      |
| Prep Date:                 | Analysis D | ate: 12   | 2/18/2017 | 917 SeqNo: 1531606 Units: mg/Kg |           |          |           |      |          |      |
| Analyte                    | Result     | PQL   | SPK value | SPK Ref Val                     | %REC      | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Benzene                    | ND         | 0.025   |           |                                 |           |          |           |      |          |      |
| Toluene                    | ND         | 0.050   |           |                                 |           |          |           |      |          |      |
| Ethylbenzene               | ND         | 0.050   |           |                                 |           |          |           |      |          |      |
| Xylenes, Total             | ND         | 0.10  |           |                                 |           |          |           |      |          |      |
| Surr: 4-Bromofluorobenzene | 1.0        |   | 1.000     |                                 | 103       | 80       | 120       |      |          |      |
| Sample ID 100NG RTEY I C   | e SamnT    | SampType: LCS TestCode: EDA Method 8021B: Volatiles |           |                                 |           |          |           |      |          |      |

| Sample ID 100NG BTEX LCS   | Samply      | /pe: LC       | S         | Tes         | Code: El | A Method | 8021B: Volat | iles |          |      |
|----------------------------|-------------|---------------|-----------|-------------|----------|----------|--------------|------|----------|------|
| Client ID: LCSS            | Batch       | ID: <b>B4</b> | 7852      | R           | RunNo: 4 | 7852     |              |      |          |      |
| Prep Date:                 | Analysis Da | ate: 12       | 2/18/2017 | S           | SeqNo: 1 | 531607   | Units: mg/K  | g    |          |      |
| Analyte                    | Result      | PQL           | SPK value | SPK Ref Val | %REC     | LowLimit | HighLimit    | %RPD | RPDLimit | Qual |
| Benzene                    | 0.94        | 0.025         | 1.000     | 0           | 94.1     | 77.3     | 128          |      |          |      |
| Toluene                    | 0.95        | 0.050         | 1.000     | 0           | 95.1     | 79.2     | 125          |      |          |      |
| Ethylbenzene               | 0.96        | 0.050         | 1.000     | 0           | 95.9     | 80.7     | 127          |      |          |      |
| Xylenes, Total             | 2.9         | 0.10          | 3.000     | 0           | 97.0     | 81.6     | 129          |      |          |      |
| Surr: 4-Bromofluorobenzene | 1.1         |               | 1.000     |             | 108      | 80       | 120          |      |          |      |

| Sample ID MB-35539         | SampType      | e: MBLK              | Test        | Code: El | PA Method | 8021B: Volat | iles |          |      |
|----------------------------|---------------|----------------------|-------------|----------|-----------|--------------|------|----------|------|
| Client ID: PBS             | Batch ID      | D: <b>35539</b>      | R           | unNo: 4  | 7852      |              |      |          |      |
| Prep Date: 12/15/2017      | Analysis Date | e: <b>12/18/2017</b> | S           | eqNo: 1  | 531610    | Units: %Red  | ;    |          |      |
| Analyte                    | Result F      | PQL SPK value        | SPK Ref Val | %REC     | LowLimit  | HighLimit    | %RPD | RPDLimit | Qual |
| Surr: 4-Bromofluorobenzene | 1.0           | 1.000                |             | 104      | 80        | 120          |      |          |      |

| Sample ID  | LCS-35539  | SampTy      | SampType: LCS TestCode: EPA Method 8021B: Volatiles |           |  |      |          |           |      |          |      |
|------------|------------|-------------|---|-----------|--|------|----------|-----------|------|----------|------|
| Client ID: | LCSS       | Batch       | ID: 35  | 539       | RunNo: 47852                             |      |          |           |      |          |      |
| Prep Date  | 12/15/2017 | Analysis Da | ate: 12   | 2/18/2017 | SeqNo: <b>1531611</b> Units: <b>%Rec</b> |      |          |           |      |          |      |
| Analyte    |            | Result      | PQL   | SPK value | SPK Ref Val                              | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| O 4 D      |            | 4.0         |   | 4 000     |  | 400  | 0.0      | 100       |      |          |      |

Surr: 4-Bromofluorobenzene 1.0 1.000 103 80 120

### Qualifiers:

\* Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

PQL Practical Quanitative Limit

S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank

E Value above quantitation range

J Analyte detected below quantitation limits

Page 5 of 5

P Sample pH Not In Range

RL Reporting Detection Limit

W Sample container temperature is out of limit as specified



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109

TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

## Sample Log-In Check List

| Client Name:                  | BLAGG                            | Work Order Number:  | 1712               | 988  |                             |                             | RcptNo:  | 1                    |
|-------------------------------|----------------------------------|---|--------------------|--|-----------------------------|-----------------------------|--|----------------------|
| Received By:                  | Isaiah Ortiz                     | 12/16/2017 9:00:00 AM                                       |                    |  | I Co                        |                             |  |                      |
| Completed By:<br>Reviewed By: | Sophia Campuzano                 | 12/18/2017 8:18:48 AM<br>iて [18] わ                          |                    |  | Sophia ?                    | in particular to the second |  |                      |
| Chain of Cus                  | tody                             |   |                    |  |                             |                             |  |                      |
| 1. Custody sea                | is intact on sample bottles?     |   | Yes                |  | No                          |                             | Not Present ✓  |                      |
| 2. Is Chain of C              | sustody complete?                |   | Yes                | V  | No                          |                             | Not Present  |                      |
| 3. How was the                | sample delivered?                |   | Cour               | ier  |                             |                             |  |                      |
| Log In                        |                                  |   |                    |  |                             |                             |  |                      |
| 4. Was an atte                | mpt made to cool the samples'    | ?   | Yes                | V  | No                          |                             | NA 🗆   |                      |
| 5. Were all sam               | nples received at a temperature  | e of >0° C to 6.0°C   | Yes                | <b>V</b>   | No [                        |                             | NA 🗆   |                      |
| 6. Sample(s) in               | proper container(s)?             |   | Yes                | <b>V</b>   | No                          | □.                          |  |                      |
| 7 Sufficient sar              | nple volume for indicated test(  | s)?   | Yes                | ~  | No                          |                             |  |                      |
|                               | (except VOA and ONG) prope       |   | Yes                | **   | No [                        |                             |  |                      |
|                               | ative added to bottles?          |   | Yes                |  | No                          | <b>V</b>                    | NA 🗆   |                      |
| 10.VOA vials ha               | ve zero headspace?               |   | Yes                |  | No [                        |                             | No VOA Vials   |                      |
|                               | mple containers received brok    | en?   | Yes                |  | No                          | <u> </u>                    |  |                      |
| 12. Does paperw               | ork match bottle labels?         |   | Yes                | <b>V</b>   | No [                        |                             | # of preserved<br>bottles checked<br>for pH:             | or >12 unless noted) |
|                               | correctly identified on Chain of | Custody?  | Yes                | ₹.   | No [                        |                             | Adjusted?  | 12 011000 1101007    |
|                               | at analyses were requested?      |   | Yes                | <b>✓</b>   | No [                        |                             |  |                      |
|                               | ing times able to be met?        |   | Yes                | ✓  | No [                        |                             | Checked by:  | ***                  |
| ()                            | · · ·                            |   |                    |  |                             |                             |  |                      |
| Special Handi                 | ing (if applicable)              |   | ·                  |  |                             |                             |  |                      |
| 16. Was client no             | tified of all discrepancies with | this order?   | Yes                |  | No [                        |                             | NA 🗹   |                      |
| Person                        | Notified:                        | Date:   | distanti enderedi  | ntmolifishik   | SADAMBASARET SANAARO WASAAR | faintiust -                 |  |                      |
| By Who                        | om:                              | Via:  | ] eMa              | il [   | Phone F                     | Fax [                       | In Person  |                      |
| Regard                        | ing:                             | COCCODE ACMA AMERICAN AND AND AND AND AND AND AND AND AND A | adali manusi dabal | helita de la constante de la c |                             | era likilar belmata         | Newholestalisticitististististististististististististis |                      |
| Client I                      | nstructions:                     |   |                    |  |                             |                             |  |                      |
| 17. Additional re             | marks:                           |   |                    |  |                             |                             |  |                      |
| 18. Cooler Infor<br>Cooler No |                                  |   | eal Da             | ite  | Signed By                   | у                           |  |                      |



